

(“Motion to Remove”). In that Motion to Remove, Plaintiffs seek to challenge Defendants’ confidentiality designations on several excerpts of Allan’s deposition testimony. While Plaintiffs dispute the propriety of Defendants’ confidentiality designations, Plaintiffs now move to file these excerpts under seal with this Court to comply with the Protective Order in this matter and Local Rule 5.1(g).

3. For these reasons, the Plaintiff respectfully request that this Court grant Plaintiffs’ Motion for Leave to File Documents Under Seal.

Dated: January 5, 2023

Respectfully submitted,

By :/s/ Tom Fleener

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served on counsel of record via the Court's CM/ECF system on this 29th day of December.

/s/ Tom Fleener

Tom Fleener

CERTIFICATE OF CONFERENCE

I certify that Plaintiffs have conferred with the Defendants regarding the relief requested in this Motion by way of email. Counsel for law enforcement defendants, including Carr in his official capacity do not object to filing the pleading under seal. It has been four days since seeking their position, and Counsel has not heard from counsel for attorney defendants.

/s/ Tom Fleener

Tom Fleener

